

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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RASHID JAHM,

Plaintiff, pro se,

v.

Case No. 05cv11638-JLT

DENNIS D. LIEBER, et al,

Defendants

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**MOTION FOR LEAVE TO ADMIT THOMAS R. MEAGHER PRO HAC VICE**

In accordance with Rule 83.5.3(b), Patrick J. Dolan, a member of the bar of Massachusetts, respectfully moves for the admission pro hac vice of Thomas R. Meagher of the Law Firm of Foster, Swift, Collins & Smith, P.C., 313 S. Washington Square, Lansing, Michigan 48933, (517) 371-8100, to appear and practice in this Court for this case as co-counsel for the defendants, Catherine Garcia-Lindstrom, in her official and individual capacity, City of Walker Police Department, and Midwest Claim Services, Inc.

As detailed in the Affidavit of Mr. Meagher (Attached hereto as Exhibit A), he is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction, and he is familiar with the local rules of the United States District Court for the District of Massachusetts. Payment of the \$50.00 admission fee has been submitted to the Clerk of the Court. I have previously entered my appearance as counsel for the defendants, Catherine Garcia-Lindstrom, in her individual and official capacity, City of Walker Police Department, and Midwest Claim Services, Inc.

WHEREFORE, Patrick J. Dolan, Esq., hereby respectfully requests that this Court grant this Motion for Leave to Admit Thomas R. Meagher pro hac vice.

Respectfully submitted,

/s/ Patrick J. Dolan  
Patrick J. Dolan, BBO #564250  
Peabody & Arnold LLP  
30 Rowes Wharf  
Boston, MA 02110  
617-951-4724

Dated January 23<sup>rd</sup>, 2006

**CERTIFICATE OF SERVICE**

I, Patrick J. Dolan, hereby certify that on this 23<sup>rd</sup> day of January 2006, I served the within Motion for Leave to Admit Thomas R. Meagher Pro Hac Vice by causing a copy thereof to be sent electronically to the registered participants in this case, if any, and paper copies mailed via first class mail, postage prepaid to the non-registered participants in this case, as identified on the Notice of Electronic Filing (NEF).

/s/ Patrick J. Dolan  
Patrick J. Dolan, Esq.

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15026-91613

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
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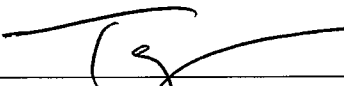
**AFFIDAVIT OF THOMAS R. MEAGHER, ESQUIRE**

I, Thomas R. Meagher, Esquire, hereby state the following:

1. I am an attorney licensed to practice law in the State of Michigan.
2. I am a member in good standing in the bars of this jurisdiction and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
3. I am an attorney in the law firm of Foster, Swift, Collins & Smith, P.C., 313 S. Washington Square, Lansing, Michigan 48933.
4. I am familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, I respectfully request that the motion to allow me to be admitted pro hac vice for the purposes of this case be allowed.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 13<sup>th</sup> DAY OF JANUARY, 2006.

  
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Thomas R. Meagher

Simone A. Zwolensky

Notary Public, State of Michigan

Ingham County, Michigan

My Commission Expires: 6-22-2006

Acting in County of Ingham

**SIMONE A. ZWOLENSKY**  
Notary Public, Ingham County, MI  
My Comm. Expires June 22, 2006